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Of Attorneys for Plaintiffs

CHIMPS, INC., INTERNATIONAL PRIMATE

PROTECTION LEAGUE and MARGUERITE GORDON

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

**CHIMPS, INC., INTERNATIONAL
PRIMATE PROTECTION LEAGUE, and
MARGUERITE GORDON,****Plaintiffs,****v.****PRIMARILY PRIMATES, INC.****Defendant.****Case No. 07-6149-HO****DECLARATION OF SHIRLEY
MCGREAL IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO DISMISS,
OR IN THE ALTERNATIVE, TO
CHANGE VENUE**

I, Shirley McGreal, declare as follows:

1. I am the founder and executive director of the International Primate Protection

League ("IPPL"), which is dedicated to the conservation and well-being of all living primates. I

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OPPOSITION TO DEFENDANTS' MOTION TO DISMISS, OR IN THE
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am the recipient of the United Nations Environment Program Global 500 Honor Roll Laureate Award. I have been directly involved in the rescue and rehabilitation of adult and baby gibbons for over thirty years. I make the statements here based on personal knowledge and could and would testify to same if called upon to do so.

2. IPPL has been a recognized leader in primate care and protection for thirty-four years. It has field representatives in thirty-one countries, and its main sanctuary is in South Carolina, where IPPL has built a habitat and enclosures for its animals that provides for all their needs in the best possible fashion. It is considered an international leader in the housing and care of gibbons – highly endangered arboreal apes native to the tropical forests of Southeast Asia. IPPL provides major financial assistance to three gibbon sanctuaries in habitat countries.

3. When I was contacted about the gibbons in need of help at Primarily Primates, Inc., (“PPI”), I agreed, on behalf of IPPL, to rescue and rehabilitate twelve of the gibbons at PPI.

4. IPPL entered into the Animal Transfer Agreement with PPI’s Receiver with the understanding and intention that IPPL would provide for lifetime care, housing, and medical expenses for the gibbons.

5. When IPPL entered into the Animal Transfer Agreement with PPI’s Receiver, IPPL agreed to pay for the costs of transport as well as any new construction required for the gibbons.

6. IPPL keeps detailed records of historical data with respect to the cost of care for the gibbons at IPPL’s sanctuary. Based on that data, I estimate that IPPL will spend approximately \$165,000 each year to care for the twelve gibbons removed from PPI.

7. Gibbons can live up to forty years or even longer in captivity. Based on an estimate of the twelve gibbons' ages and expected lifespans, IPPL will spend no less than \$2,145,000 to care for the gibbons.

8. When IPPL contracted to provide lifetime care for the gibbons, it assumed the contract was worth at least \$2,145,000 to IPPL.

9. Based on its dedication in protecting the lives of animals, IPPL valued the contract far in excess of \$2,145,000.

I declare under penalty of perjury under the laws of the United States that these facts are true and correct and that this Declaration is executed this 31st day of August, 2007, at Summerville, South Carolina.

DATED: August 31, 2007

By: Shirley McGreal

Shirley McGreal

s/ Bruce A. Wagman
BRUCE A. WAGMAN
Pro Hac Vice
(415) 901-8700

Attorney for Plaintiffs
CHIMPS, INC., INTERNATIONAL PRIMATE
PROTECTION LEAGUE, and MARGUERITE
GORDON

CERTIFICATE OF SERVICE

I certify that on September 4, 2007, I served or caused to be served a true and complete copy of the foregoing **DECLARATION OF SHIRLEY MCGREAL IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS, OR IN THE ALTERNATIVE, TO CHANGE VENUE** on the party or parties listed below as follows:

- ☒ Via CM/ECF Filing
- ☐ Via First Class Mail, Postage Prepaid
- ☐ Via Facsimile
- ☐ Via Personal Delivery

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